

1 or three different options that a CLEC can avail itself of.
2 One is, that a CLEC can take information off of one screen,
3 on the inquiry screen, and cut-and-paste it to the CLECs'
4 Microsoft compatible screen on their system, is that
5 correct?

6 A Yes, that's one way to do it.

7 Q Okay. Now, if you use cut-and-paste, that just
8 eliminates the need to retype it, isn't that correct?

9 A Yes. That's what we mean by manual re-entry of data.

10 Q Okay. And so, if the CLEC doesn't have the Microsoft
11 compatible order entry system, then cut-and-paste is not
12 even an option, is it?

13 A That's correct.

14 Q Okay. And it takes time to cut-and-paste, does it not?

15 A Yes, but not much.

16 Q Okay. But even so, does the BellSouth order entry
17 representatives have to cut-and-paste or re-enter any
18 information?

19 A Yes, sometimes they do.

20 Q For example, what?

21 A For example, there are some instances of telephone
22 number assignment that can't be carried over directly to a
23 service order, and service reps will actually have to write
24 them down and re-enter them.

1 Q But they have various databases available to them at
2 one time that they can toggle between, and things of that
3 nature, isn't that right?

4 A Yes.

5 Q Okay. And that's not available to a Competing LEC, and
6 that's why the Competing LEC has to write this information
7 down -- because if they get out of one screen, then that
8 information is gone -- is that correct?

9 A No, I don't think that's correct.

10 Q Okay. To obtain the data -- one of the other options
11 is to obtain the data for the CLEC through its own
12 customization, is that correct?

13 A Yes.

14 Q And provide its own customized interface? To do that,
15 the CLEC would need to know the specifications of the
16 BellSouth system, is that correct?

17 A Yes.

18 Q And the specifications will help that CLEC evaluate the
19 cost and what they would need to do in order to build their
20 own interface, is that correct?

21 A Yes.

22 Q Okay. Now, Ms. Calhoun, maybe you can help me with
23 this, because MCI has asked probably six weeks ago and has
24 continuously asked in the past six weeks to get the

1 specifications from BellSouth. Should we be asking you or
2 somebody in your group for the specifications on LENS?

3 A Well, you could.

4 Q Can I?

5 A I would be happy to provide them. If there has been
6 some misunderstanding, we certainly want to make our
7 specifications available to MCI.

8 Q All right. And if it is not you, who else should we
9 talk to to get a response?

10 A You could talk with Linda Tate.

11 Q BellSouth has been continuously -- well, there have
12 been several additions to the LENS. One is, the zip code
13 information is now available that Competing LECs wanted.
14 The other that I'm aware of is, the customer service
15 records, and you mentioned that in your testimony. When
16 LENS is updated, when and how are Competing LECs notified of
17 any changes in the system?

18 A I think it depends on the system and the degree of the
19 change. What has happened up to this point is that we have
20 had CLEC conferences, and we have presented information in
21 those conferences, and we have also had CLEC training
22 classes. So, now that people are beginning to be trained on
23 LENS, we're providing that information in the context of the
24 training and in updates to the training manuals that are

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
COLUMBIA, SOUTH CAROLINA

HEARING #9633

JULY 7, 1997

2:30 P.M.

DOCKET NO. 97-101-C: BELLSOUTH TELECOMMUNICATIONS, INC. -
Entry into InterLATA Toll Market [Section 271].

HEARING BEFORE: Chairman Guy Butler, Presiding; Vice Chairman
Philip T. Bradley; and Commissioners Rudolph Mitchell, Cecil A.
Bowers, Warren D. Arthur, IV, William "Bill" Saunders, and C.
Dukes Scott.

STAFF: Gary E. Walsh, Deputy Executive Director; James M.
McDaniel, William O. Richardson and David S. Lacoste, Utilities
Department; F. David Butler, Esq., General Counsel; and Yvonne
T. Grey, Hearing Reporter.

BELLSOUTH COMPANIES: Harry M. Lightsey III, Esq., William
F. Austin, Esq., William Ellenburg, Esq., and Edward Rankin,
Esq., representing BELLSOUTH TELECOMMUNICATIONS, INC.

Kevin A. Hall, Esq., and Dwight F.
Drake, Esq., representing BELLSOUTH LONG DISTANCE, INC.

INTERVENORS: William R. Atkinson, Esq., Darra W. Cothran,
Esq., and Carolyn C. Matthews, Esq., representing SPRINT
COMMUNICATIONS COMPANY, L.P.

John M.S. Hoefer, Esq., and Marsha A. Ward,
Esq., representing MCI TELECOMMUNICATIONS, INC.

Mitchell M. Willoughby, Esq., representing SOUTH
CAROLINA CABLE TELEVISION ASSOCIATION.

Herbert Buhl, Esq., representing COMMUNICATION
WORKERS OF AMERICA.

Francis P. Mood, Esq., Kenneth P. McNeely, Esq.,
Michael Hopkins, Esq., and Steve A. Matthews, Esq.,
representing AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.

Elliott F. Elam, Jr., Esq., representing the
CONSUMER ADVOCATE FOR THE STATE OF SOUTH CAROLINA.

Russell B. Shetterly, Jr., Esq., representing
AMERICAN COMMUNICATIONS SERVICES, INC.

Frank R. Ellerbe, III, Esq., representing SOUTH
CAROLINA COMPETITIVE CARRIERS ASSOCIATION.

TRANSCRIPT OF TESTIMONY AND PROCEEDINGS
VOLUME 2 OF 7

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1 think you might be able to do it?" And BellSouth gets those
2 kinds of inquiries and handles those by looking at an
3 installation calendar.

4 Q. Isn't that going to be the exception rather than the rule?

5 A. I don't know.

6 Q. So you don't know if new entrants are going to--would you
7 expect new entrants to try to get due dates when they are not
8 going to place an order on a regular basis?

9 A. I don't know. Again, the due date information isn't
10 necessarily required for many of the types of orders that we
11 would expect new entrants to place. If an existing customer
12 wants to switch their service to another local service
13 provider, their service is already installed. Again, that's a
14 billing record change. So, I mean, I can't really say that
15 they would need access to that information on most of the
16 orders.

17 Q. Let's talk about LENS capacity. How many simultaneous
18 users can LENS support?

19 A. We haven't found the upper limit of that yet. We're still
20 working to try to find out if there is a point where we would
21 have a problem.

22 Q. Have you identified any number?

23 A. The number changes depending on the test conditions.
24 We're operating totally separate from the LENS system that's

1 being used by the CLECs. We have a separate test bed system of
2 it that our systems experts continually work with to try to
3 duplicate--or that's not a good word, simulate different kinds
4 of scenarios, and they will vary the inputs based on how many
5 users, how quickly the information is coming through. So, I
6 don't--

7 Q. Do you have a range?

8 A. No, I don't. Sorry.

9 Q. Now, I think you state that LENS has been designed to
10 support multiple pre-order transactions for 5,000 orders
11 expected per day. How many pre-ordering transactions per order
12 did you assume?

13 A. I believe we assumed three.

14 Q. And I'm hearing different numbers on what you say is the
15 upper limit of LENS. Your exhibit says 1,000 to 1,200, and
16 then you said 2,000 in your testimony.

17 A. We have been able to process 2,000 orders a day. And
18 again you're kind of switching back and forth here between pre-
19 ordering and ordering; but for ordering, we've been able to
20 process 2,000 orders a day; but on a consistently sustained
21 basis that, you know, we feel is a reasonable on-going
22 estimate, 1,200 is a better number.

23 Q. And that's on a nine-state regional basis?

24 A. Yes. Given that EDI is the industry standard ordering

ATTACHMENT 17

Restrictions on Telephone Number Reservation and Selection Being Imposed on CLPs by BellSouth

System Used	SONGS	RNS	Interim Manual & Electronic	LENS Firm Order Mode (2)	LENS Inquiry Mode
Rules Applied					
Marked During Transaction	X	X		X	
Marked For 24 Hours					X
Selected for 7 Days	X	X		X	
Reserved for 9 Days					X
Reserved for 90 Days			X		
100 Number / 5% Limit on CLP Reservations (3)			X		X (1)

(1) Includes both numbers viewed (and therefore Marked for 24 Hours) and reserved in a given central office.

(2) Numbers can only be selected by the submission of a valid LENS order. Cancelling an order before it is submitted returns the number(s) to the available pool.

(3) 5% Limitation is a violation of the AT&T Interconnection Agreement.

Sources: LENS Users Guide. ATLAS/Harmonize Users Guide. Meetings/letters with/from ATLAS Administrators and Account Team.

ATTACHMENT 18

RECEIVED SEP 4 1997

(164)



Pamela A. Nelson

Room 12W54
Promenade II
1200 Peachtree St., NE
Atlanta, GA 30309
404 810-3100

September 3, 1997

Ms. Jan Burriss
BellSouth Telecommunications, Inc.
Suite 410
1900 W. Exchange Place
Tucker, Georgia 30084

Dear Jan,

As a follow-up to our discussion last week, I would like to share AT&T's experience with the systems BellSouth has provided for telephone number assignment. AT&T's experience indicates that BellSouth is improperly restricting AT&T's ability to reserve telephone numbers by severely limiting the quantity of numbers available to AT&T.

AT&T believes that any limitation on the ability to reserve telephone numbers is unacceptable and expressed this belief to BellSouth in May, 1997. Indeed, the limitation is contrary to our Interconnection Agreement, section 28.1.1.4 which states, "BellSouth will reserve up to 100 telephone numbers per NPA-NXX at AT&T's request, for AT&T's sole use. BellSouth will provide additional numbers at AT&T's request in order that AT&T have sufficient numbers available to meet expected needs..." AT&T has asked BellSouth to review this policy in light of its parity obligation under the Telecommunications Act of 1996 and our Interconnection Agreement and examine alternatives that will allow BellSouth to administer telephone number reservations without restricting AT&T's ability to provide service to customers. Unfortunately, BellSouth has not sought to examine alternatives that will ease this restriction on AT&T.

Although we have somewhat limited experience with telephone number reservation utilizing BellSouth's solutions for telephone number assignment, our experience is proving that BellSouth is improperly limiting the quantity of telephone numbers AT&T is allowed to reserve. AT&T currently uses a Network Data Mover (NDM) file transfer to request and receive telephone numbers from BellSouth. Recent requests for telephone numbers indicate that AT&T's limit has been unreasonably and inexplicably decreased. In fact, in many instances, requests for as little as 10 numbers are rejected by BellSouth on the basis that AT&T's limit has been reached.

As AT&T prepares to change its interim process to use the telephone number reservation function in BellSouth's LENS system, we have uncovered an unexpected LENS system response that indicates that BellSouth's improper and unreasonable limitation is continuing. In a training session, we had five users who attempted to use LENS inquiry function "select a telephone number." Those five users validated the same address and continued to the next step to view and select a telephone number. LENS displayed only six numbers to the first user with a message that the AT&T limit had been reached. Other users were denied the ability to view any telephone numbers and received a message that AT&T's limit had been reached. No telephone numbers were reserved. ON a subsequent attempt, all users were denied the ability to view telephone numbers. Again, the message returned by the LENS system indicated that the request was denied because AT&T had reached the limit dictated by BellSouth. A review of the results of our inquiries indicates that BellSouth not only severely limits AT&T's ability to reserve telephone numbers, BellSouth is also limiting AT&T's ability to view telephone numbers that are available.

AT&T must ask BellSouth to review the Interconnection Agreement and to take steps necessary to comply with the provisions and allow AT&T 100 numbers per NPA-NXX and the ability to request additional numbers if there is a need. BellSouth must also take steps to ensure that Section 28.1.1.4's requirements will be met for the interim interfaces as well as the permanent EC-Lite interface. AT&T expects BellSouth's written response by September 10, 1997

Sincerely,


Pamela A. Nelson

ATTACHMENT 19

ATTACHMENT 19

LENS FAILS TO PROVIDE NON-DISCRIMINATORY ACCESS AS AN INTERFACE FOR ORDERING AND PROVISIONING

LENS does not, and cannot, provide parity of access as an ordering interface. Indeed, by stating that it expects that 80 percent of orders will be sent via EDI, BellSouth has as much as admitted that LENS is not a viable ordering interface for the vast majority of CLEC orders expected. As in the pre-ordering process, LENS does not provide an electronic interconnection between the CLEC's systems and BellSouth's; thus, a CLEC using LENS cannot electronically transfer a service order from BellSouth's OSS into its own. Instead, the new entrant's sales representative is required to enter the same ordering data again manually into its own system (as well as into BellSouth's) if the entrant wishes to use the service order to create certain records in its own systems. BellSouth's representatives, who utilize a single interconnected system, face no such problem.

Even leaving aside the necessity of manual dual data entry, LENS has numerous shortcomings as an ordering interface that preclude it from providing parity of access in the ordering process. First, as in the pre-ordering context, LENS cannot effectively be used by large-volume resellers as an ordering/provisioning interface. Not only does the necessity of dual data entry make the use of LENS impracticable for such resellers; LENS has a total capacity of, at most, only 2,000 orders per day -- throughout the nine-state BellSouth Region -- which is below the volume of orders that AT&T alone has projected that it will submit to BellSouth. See Stacy OSS Aff., Exh. WNS-43. Consequently, larger new entrants will be required to use EDI for ordering and LENS for pre-ordering (since BellSouth does not make pre-ordering available

through the EDI interface) -- a non-integrated, multiple process that is inferior to the process that BellSouth provides to itself.¹

Second, new entrants do not have the capability to order through LENS the same services that BellSouth can order electronically to support its own retail operations. For example, as reflected in the table provided below, only 6 of the 11 order types that are endorsed for use by CLECs by industry standards and available to BellSouth for its own use are available through LENS.

ACTIVITY TYPE	BellSouth OSS	Industry Standard	LENS
New Installation	Yes	Yes	Yes
Change/Modification to Existing Service	Yes	Yes	No
Inside Move -- Physical Termination within Building	Yes	Yes	No
Outside Move & End User Location Disconnect	Yes	Yes	No
Disconnect	Yes	Yes	Yes
Record Activity -- Administrative Changes	Yes	Yes	No
Conversion to New Local Service Provider with Changes	Yes	Yes	Yes

¹ LENS is also impracticable for large CLECs as an ordering interface because its design makes ordering a time-consuming process. LENS' list of products and services (now over 100 items) is not presented in any particular order, thereby preventing CLECs from locating information about a particular product or service in a timely and accurate manner. Moreover, LENS does not allow a new entrant to order several products and services for selection at one time. As a result, a new entrant must repeat the selection process for each individual product and service. Multiple selections cause delays and increase the chance that a new entrant may duplicate or omit a selection.

ACTIVITY TYPE	BellSouth OSS	Industry Standard	LENS
Conversion to New Local Service Provider "As Is"	Yes	Yes	Yes
Suspend Service	Yes	Yes	Yes
Restore Service	Yes	Yes	Yes
PIC Change	Yes	Yes	No

For the five types of activities which cannot be ordered through LENS, a new entrant that orders services only through LENS will be required to submit service orders by facsimile. For example, LENS cannot be used to order changes to the existing service of a customer. If the new entrant's customer wants to add a new feature such as call waiting, the CLEC will need to fax a service order to BellSouth.² This is clearly discriminatory, since BellSouth's representatives have the ability to order changes to existing customer service electronically. The manual processing of change orders also significantly burdens both CLECs and their customers, since requests by customers for changes in service are quite commonplace in the local exchange market.

Moreover, as shown in the following chart, LENS is greatly limited in its ordering capability because it supports only three of the ten industry standard requisition types identified by industry groups to identify the kinds of products and services that a new entrant can order.

² Until July 1997, a new entrant was also unable to use LENS to request suspension or restoration of a service (as for a seasonal business or for residential customers who live in the area only for part of the year). BellSouth installed this capability in LENS only after members of the South Carolina PSC expressed concern at the Section 271 hearings as to whether LENS had this capability.

Requisition Types	Industry Standard	LENS
Loop	Yes	No
Loop with Interim Number Portability	Yes	No
Interim Number Portability	Yes	No
Unbundled	Yes	No
Resale	Yes	Yes
Port	Yes	No
Directory Assistance	Yes	No
Directory Listing -- White	Yes	Yes
Directory Listing -- Yellow	Yes	Yes
Port/Loop Combination	Yes	No

Thus, service orders from CLECs for any requisition type other than simple resale will not be processed electronically by LENS; any such orders must be submitted by fax.

In short, if a customer who initially orders service from a new entrant later wishes to add a new feature, add a new line to its existing service, move from one location to another within the same building, move down the street, change its directory listing, change its billing address, indicate the type of business it conducts in the white page listing, or change its choice of primary interexchange carrier, the new entrant will be unable to use LENS to place any of these order requests with BellSouth. Instead, the entrant will be required to send the order by facsimile

(or by EDI, if the entrant has equipped itself with that interface) -- a process that increases the risk of errors, time and expense for the entrant.

LENS also does not provide new entrants the capability to order all of the particular services that BellSouth makes available for resale. In fact, a new entrant can order only from eight of the 114 families of services that are listed in the LENS Inquiry Mode (pre-ordering mode) as available for resale (in addition to POTS). The remaining 106 families of services must be ordered by facsimile -- an error-prone, costly and time-intensive process. In contrast, BellSouth has the capability to submit electronic orders for all of those 114 families of services. The following table lists the 114 families of services available, with the eight services that can be ordered through LENS (i.e., the services listed as available in the Firm Order Mode of LENS) identified in boldface.

MEMORY CALL	SYNCHRONET MULTIPOINT	CALL DETAIL
FAX	800 SVC-CXR SEL ON REV CH	MWI VISUAL
COURTESY COMPLETE	NUMBER PORTABILITY RCF	SHARED SPEED CALLING
PRESTIGE I	BELLSOUTH.NET	MULTISERVE EBS
MULTILINE HUNT GROUP	UNIF ACCESS NUMBER	CUSTOMIZED CODE RESTRICTION
SURROGATE CLIENT NUMBER	MLHG OVERFLOW	TOUCHSTAR PULSE SGN
TOUCHSTAR	TOUCHTONE	MULTISERVE ACD
SAVER SERVICE	CALL PATTERNS	CUSTOMIZED DIALING PK
MEGA-LINK ISDN	MULTISERVE SERVICE	SPECTUS-COM'L QUAL VIDEO
ALTERNATE ROUTING	AUTO NUMBER IDENTIFICATION	EOEAS
BELLSOUTH LONG DISTANCE	FLEXSERVE SERVICE	ACCUPULSE
ESSX ISDN-NATIONAL	AMS-SVC ORDER REQUESTS	PRESTIGE COMM SERVICE
DID WITH USER TRANSFER	CUTOFF ON DISCONNECT	MEMORY CALL ENHANCED
MAKE BUSY/NIGHT TRANSFER	SMPL MSG DESK INTERFACE	MESSAGE RATE SERVICE
MSG WAITING IND AUDIBLE	QUICKSERVICE	ISDN-IND LINE SVC -CUSTOM

PRESTIGE SINGLE LINE	INTRALATA EQUAL ACCESS	ESSX
CONDITIONING	VOICE ACTIVATED DIALING	ZIPCONNECT
C.O. BLOCK W/OPR SCREEN	INTER SWITCH SMDI	PPSN-REV CHG ACC
ADWATCH	ROUTE DIVERSITY	PULSELINK
ESSX ISDN-CUSTOM	DID	MWI NO RATE HTG TEMP FIN
MSG WAITING IND AUD/VIS	AREA PLUS SERVICE	LOCAL MEASURED SVC
MWI ACTIVATION (VISUAL)	ISDN-IND SVC-NATL	SELECT CLASS CALL SCREEN
TRNK SIDE ACCESS	MWI ACTIVATION (AUDIBLE)	CALL DETAIL INFORMATION
PATHLINK	MLHG CO ANNOUNCE	VISUAL DIRECTOR
HIGH CAP DIGITAL SVC	VOICE GRADE LINE / CKT SW BSA	PRESTIGE DELUXE
MLHG ACCESS TO EACH PORT	BRIDGING	IPP
WARM LINE	REV BLG ON CKT/PKT ACC	QUEUING
FASTER SIGNALING ON DID	CUST SERVICE AREA (ACCS)	AUTO NMBR IDENT VIA FGD
AUTO NMBR IDENT VIA FGB	HOT LINE	DTMF SIGNALING ON DID
BACK-UP LINE	UNIF UCD LINE HUNTING	PPSN-RPOA PRESELECT
AIN TOOLKIT	TRUNK SIDE ACC (TANDEM)	ISDN-IND LINE SVC-NATL2
REMOTE CALL FORWARDING	PRESTIGE II	AUTO PROTECTION SWITCHING
SWITCH ACCESS	SYNCHRONET SERVICE	DID TRUNK QUEUING
CCSAC-	UNIF 7D ACC NUM RCF	RINGMASTER
MEGA-LINK ISDN NATL2	WATSSAVER SERVICE	PATHLINK (NI-2)
CRISIS LINK	CUSTOM CALLING	CLLD DN VIA 900 NXX
800 SVC TO DID LINE		

In addition, as reflected in the table below, LENS does not provide new entrants the capability to order 17 of the 21 directory listing options that a BellSouth service representative can order electronically for its customers:

Directory Listing Options	BellSouth	LENS
Listed Name	Yes	Yes
Non-published	Yes	Yes

Directory Listing Options	BellSouth	LENS
Non-listed	Yes	Yes
Additional Listing	Yes	Yes
RingMaster	Yes	No
Alternate Call	Yes	No
Answering Service	Yes	No
Cross Reference	Yes	No
Designer Bold	Yes	No
Designer Bold Plus	Yes	No
Designer Script	Yes	No
Designer Script Plus	Yes	No
Designer Extra Line Standard	Yes	No
Designer Extra Line Bold	Yes	No
Designer Extra Line Script	Yes	No
Foreign Listing	Yes	No
Foreign Cross Reference	Yes	No
Stylist	Yes	No
Indentions	Yes	No
Captions	Yes	No
Designation	Yes	No

A new entrant using LENS would therefore be required to submit orders for most of these directory listing options by facsimile, assuming that the new entrant knew that these options were available. These cumbersome multiple processes are plainly inferior to those of BellSouth, which can submit orders for these options electronically.

Orders for "complex" services also cannot be submitted via LENS; they must be submitted manually. As I previously explained in my discussion of EDI, BellSouth electronically inputs all orders for all complex services into its own systems. Once that order is entered, BellSouth's systems generate a service order and enter the information from the order into its various legacy systems. CLECs, by contrast, are unable to enter such orders into their own systems, given the nature of BellSouth's procedure for handling orders for complex services. See ¶¶ 111-112, supra.

Although LENS now displays Regional Street Address Guide ("RSAG")-valid city abbreviations (a capability that BellSouth did not provide in LENS until mid- 1997), CLECs must re-enter this information into the service order because LENS does not enable CLECs to enter the information electronically. This procedure increases the risks of error and, in fact, has resulted in the rejection of a substantial number of AT&T orders. By contrast, BellSouth representatives are able not only to access such data in BellSouth's systems, but to transfer that data electronically into the order so as to populate the address portion of its order without any manual intervention or potential for human error.

Third, as described in Attachment 19a, LENS does not provide a new entrant with the same on-line, front-end edits available in BellSouth's RNS or DOE (or Service Order Navigation System ("SONGS")), which is used by BellSouth in certain states other than South

Carolina). On-line edits in these BellSouth systems check for errors and prevent the release of orders to SOCS until the BellSouth service representative corrects such errors. LENS, by contrast, only edits for the presence of data in required fields -- not for content or conformity with BellSouth's business rules. Therefore, LENS will release orders with errors that BellSouth's own ordering systems would not release. Many errors in LENS orders will be identified only after LENS releases the order and the new entrant's service representative is off-line with respect to that particular order. Without on-line edits, new entrants are more likely to submit orders with errors that cause rejection by BellSouth's systems; in that case, either BellSouth will process the order manually or the order will have to be resubmitted after the CLEC receives a rejection notice. The cycle time for that process will cause delays in providing service to customers, as well as increase transaction costs.

Even where LENS does provide on-line edits, it does so inefficiently. For example, unlike BellSouth's systems, LENS does not highlight mandatory fields to distinguish them from optional fields -- a procedure that increases the risk that necessary data will be omitted, and the order later rejected. In addition, LENS only displays one error at a time. Thus, if a particular order has three errors, a new entrant would have to repeat essentially the same ordering process three times in order to identify and correct all of the errors.

Fourth, once an order has been submitted via LENS, LENS does not give a new entrant access to the same information that BellSouth representatives have in performing their duties. LENS users cannot access pending orders; instead, LENS will display only the status of an order (such as "Order Rejected For Error"). In addition, the FOCs and completion notices ("CNs") provided by LENS do not describe the services that the customer ordered -- information

to which BellSouth has access in its retail operations. As a result of this lack of access, a CLEC using LENS cannot verify that the services that actually were ordered in BellSouth's OSSs are the services that the customer actually requested. If the CLEC's customer does not receive the services that it wanted, it will blame the mistake on the CLEC -- not on BellSouth.

Fifth, with the exception of changes in due dates, CLECs using LENS do not have the same ability to change or cancel a pending order as a BellSouth representative. Once it has submitted an order via LENS, a CLEC can cancel or change the order only by notifying BellSouth by telephone or by facsimile. The CLEC cannot even correct its own errors or cancel an order that is in error. By the time the cancellation or change is implemented by BellSouth, it will probably be necessary to change the telephone number and due date that were originally requested for the customer. This process delays the provision of the service requested by the customer, increases the entrant's costs, and increases the likelihood that the customer will not receive the services that it desires at the time it desired (and will perceive the CLEC's service to be inferior to BellSouth's). By contrast, BellSouth's representatives can cancel or change customer orders on their systems at any time.

Finally, although BellSouth representatives can offer customers a specific four-hour "bloc" of appointments that best suits the customers' needs (such as from 10 a.m. to 2 p.m.), CLECs using LENS for both pre-ordering and ordering may only specify generally "a.m." or "p.m." appointments. Even if BellSouth is developing the four-hour block of time capability for

LENS by Mr. Stacy, that promise remains unfulfilled -- and is therefore insufficient to satisfy BellSouth's obligations.³

The numerous deficiencies in LENS' ordering capabilities put the CLECs at a marked competitive disadvantage in relation to BellSouth's own retail operations. This was illustrated during the demonstration of the BellSouth interfaces at the "technical conference" held in August before the Louisiana PSC. At the request of MCI, BellSouth was contacted twice for the purpose of adding call forwarding to the service of an existing BellSouth customer. On the first call, a BellSouth automated response system answered, and the transaction was completed within 30 seconds. On the second call, when MCI asked to speak directly to a BellSouth customer representative, the representative took the order, and the transaction was completed within one minute. In both situations, BellSouth stated that the service would be installed within a few hours on the same day. MCI then placed a similar order via LENS for a CLEC customer; due to the inability of LENS to request additional features as a separate order, the order had to be presented as one for the migration of an existing BellSouth customer, with the customer adding call forwarding as part of its service with MCI.⁴ The transaction took nearly 15 minutes to complete -- and BellSouth advised that the service would be installed in one or two days. Thus,

³ See Stacy OSS Aff., ¶ 36; Ameritech Order, ¶¶ 55, 179. Mr. Stacy admits that BellSouth's RNS system enables customers to select particular four-hour appointment intervals, but attempts to minimize its importance by stating that it applies only to "orders involving inside premises jacks." Id. Such orders, however, are frequently necessary when new installations or requests for additional lines are made by BellSouth's residential customers, most of whose orders are handled by its RNS system. Id., ¶ 8.

⁴ The order was submitted in this way on LENS because LENS can order an additional feature to a customer's existing service as part of a migration order, but LENS cannot be used to order an additional feature after the migration order has been placed.

the ordering and installation times were far shorter when a BellSouth customer, rather than a CLEC customer, was ordering the service.

In short, LENS requires CLECs to use manual processes that BellSouth is not similarly required to use in its retail operations. These processes have less functionality and are slower, more prone to errors, and more costly than BellSouth's own systems; all of these deficiencies adversely affect a new entrant's ability to provide customers with the same level and quality of service that BellSouth can provide its customers. For these reasons, LENS does not provide nondiscriminatory access as an ordering/provisioning interface.